

# State Water Contractors

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July 22, 2005

Mr. Paul Dabbs  
Chief, Water Resources Evaluation Section  
Statewide Water Planning Branch  
California Department of Water Resources  
PO Box 942836  
Sacramento, CA 94236-0001

Dear Mr. Dabbs:

The State Water Contractors, Inc. appreciates the opportunity to provide comments on the Draft California Water Plan Update 2005. The SWC<sup>1</sup> represents 27 of the 29 public agencies that have contracts with the State of California for delivery of water from the State Water Project. A SWC representative along with representatives from several of our member agencies were members of your advisory committee.

The Department of Water Resources applied a new strategic planning approach in developing the 2005 Water Plan Update. This new approach emphasizes the importance of a balanced process in developing sound management objectives for California's water resources. The 2005 Water Plan Update provides a process for communicating the needs and benefits of diverse approaches to water management and a sound water delivery system. The public review draft provides a balanced approach in emphasizing development and diversification. This includes a reasonable approach for balancing water supply development and environmental concerns. The Plan recognizes that water supply supports the vital economy, healthy environment and high standard of living for the state.

The Water Plan also embraces the reality that most of California's water supply planning occurs at the local level. The Water Plan aims at assisting regions to develop integrated regional management plans and supports improvements in the

<sup>1</sup> Alameda County Flood Control & Water Conservation District, Zone 7; Alameda County Water District; Antelope Valley-East Kern Water Agency; Casitas Municipal Water District on behalf of the Ventura County Flood Control District; Castaic Lake Water Agency; Central Coast Water Authority on behalf of the Santa Barbara County FC&WCD; City of Yuba City; Coachella Valley Water District; County of Kings; Crestline-Lake Arrowhead Water Agency; Desert Water Agency; Dudley Ridge Water District; Empire-West Side Irrigation District; Kern County Water Agency; Littlerock Creek Irrigation District; The Metropolitan Water District of Southern California; Mojave Water Agency; Napa County FC&WCD; Oak Flat Water District; Palmdale Water District; San Bernardino Valley Municipal Water District; San Gabriel Valley MWD; San Geronimo Pass Water Agency; San Luis Obispo Co. FC&WCD; Santa Clara Valley Water District; Solano County Water Agency; and Tulare Lake Basin Water Storage District.

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statewide infrastructure system to facilitate integrated regional water management. DWR's inclusion of a 65-member advisory committee comprised of urban, agricultural and environmental interests along with an extensive public review process illustrates an attempt to develop a balanced plan that serves the interests of all Californians.

The SWC also recognizes that changing the focus of the Water Plan to a strategic plan and expanding the supporting analytical analysis was an ambitious undertaking. In the end, however, although the Plan development stretched over 7 years, DWR still was not able to focus on plan details and develop specific recommended actions. Unfortunately, there are water supply reliability and water quality needs that require immediate attention. The Association of California Water Agencies (ACWA) has outlined these issues in its Blueprint for California Water. Many of the components of the Blueprint should be incorporated into the Draft California Water Plan Update. The components of the Blueprint will be key elements of any future plan for achieving the vision of a reliable water supply to support the vital economy, healthy environment and high standard of living for the state. More important, unlike the Water Plan, the Blueprint is more focused on specific actions. While the SWC supports all of the Blueprint's Action Plan components, there are a number with a direct relationship to the future of the State Water Project.

Action I: Improve the existing Delta water conveyance system A major component of this action plan item is the implementation of the suite of actions known as the Delta Improvement Package, which was unanimously approved by the California Bay-Delta Authority. This suite of actions was described in the CALFED ROD and should be implemented as soon as practicable. The Water Plan should reflect coordination with the water supply reliability components of the CALFED ROD in a manner similar to the ACWA Blueprint. The SWC also calls for DWR to look for more innovative solutions for improving statewide water management by investigating ways of utilizing existing infrastructure and operations through mutually beneficial partnerships. This goes beyond the Water Plan's discussion of maintaining aging infrastructure and implementing CALFED. A recommendation should be added to the Water Plan that directs the State to evaluate where there are bottlenecks in the water supply systems and what to do to relax those bottlenecks.

Action II: Evaluate long-term threats to the Delta levee and conveyance system and pursue actions to reduce threats The Jones Tract levee failure in 2004 demonstrated the vulnerability of the Delta physical system. The ACWA Blueprint recommends, and the SWC concur that the Governor should assemble a "blue-ribbon" commission to analyze findings by DWR regarding the levee system, and develop a strategic plan by December 2006 for reducing vulnerability on the Delta. This concept should be included in the Water Plan.

Action IV: Implement and fund the Sacramento Valley Water Management Program This is a collaborative approach to meeting regional and statewide needs for water, environmental protection and water use efficiency. The program includes more than

50 projects including groundwater management, water use efficiency measures, water transfers and other strategies. The program will benefit the SWP and other water users statewide, as well as providing instream and Delta environmental benefits. It is an example of what the Water Plan should include as strategies for water management programs.

Action V: Develop additional groundwater and surface water storage, including proposed surface storage projects now under study if they are determined to be feasible One key element missing from the Draft Water Plan Update is the consideration of surface storage. It is imperative for the SWC to have access to cost effective surface storage and groundwater storage in order for them to maximize efficient use of their available SWP supplies. The CALFED ROD pointed out the need for storage; this is reiterated in the ACWA Blueprint. Surface storage is given only cursory attention in the Draft Water Plan Update.

Action IX: Modernize the ESA and other laws and regulations to allow water infrastructure projects, water supply and water quality activities to proceed while protecting species and habitats Layered regulatory constraints have negatively impacted SWP pumping schedules, thus impacting the reliability of water supplies to SWP customers, both agricultural and urban. The Water Plan should contain recommendations for regular peer review of laws, regulations and endangered species listings to reflect new scientific data and information, and to incorporate the impacts of other factors such as pollution and invasive species. Eliminating burdensome regulations that impact water supplies without providing demonstrated environmental benefits will allow the maximum amount of water to be delivered from the existing system while continuing to provide environmental protection.

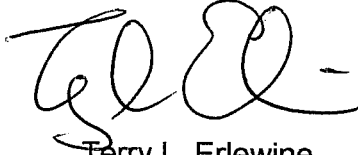
Action X: Expedite the approval process for voluntary water transfers DWR and the SWC rely on voluntary water transfers and exchanges to better manage available water supplies. Appropriately designed water transfer programs can assist the entire state in meeting its water needs. The Water Plan should recognize the utility of water transfers and include and support them as a viable part of water supply planning.

Action XII: Support integrated regional water management plans The SWC strongly support this concept, which is articulated in the Water Plan. However, certain water management functions and water supply and water quality projects must fall under the purview of the State, as described in the Blueprint actions above. Only a coordinated effort between statewide agencies and projects and regional/local agencies and projects will ensure California's water future.

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Thank you again for the opportunity to comment on the Draft California Water Plan Update 2005. If you have any questions, please contact me at (916) 447-7357 ext. 203.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Erlewine', with a stylized flourish at the end.

Terry L. Erlewine  
General Manager

cc: Member Agencies